

REMARKS

In the above referenced case, claims 125-128 are pending. Applicant will sequentially address the issues raised by the Examiner.

I. The 35 U.S.C. §103 Rejections

Claims 125-128 were rejected under 35 U.S.C. §103(a) as being unpatentable over Atarashi et al., U.S. Patent No. 5,172,254 (“ATARASHI”) in view of Konno, U.S. Patent No. 4,497,015 (“KONNO”). Applicant respectfully traverses the rejections.

A. KONNO Is Non-Analogous Art

“In order to rely on a reference as a basis for rejection of an applicant’s invention, the reference must either be in the field of applicant’s endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.” MPEP 2141.01 (a).

1. KONNO Is Not in the Same Field of Endeavor as the Present Application

Claims 125-128 recite methods and systems for displaying an image in an image projection system. In contrast, KONNO discloses technology relating to photolithography in semiconductor manufacturing processes. KONNO, col. 1, lines 6-10. Technology relating to projection of images onto a screen viewable by humans is not in the same field of endeavor as technology relating to semiconductor manufacturing processes.

2. KONNO Is Not Reasonably Pertinent to the Particular Problem with which the Inventor Was Concerned

Claims 125-128 recite methods and systems displaying an image in an image projection system. One of the problems being addressed by these claims relates to the

efficiency of light transmission to light altering means (e.g., liquid crystal devices). In contrast, KONNO addresses the problem relating to fine circuit pattern resolution on a semiconductor substrate. KONNO, col. 1, lines 12-17. Thus, KONNO does not address problems reasonably pertinent to the particular problems dealt with by claims 125-128.

Based on the foregoing, KONNO is non-analogous art and should not have been cited in combination with ATARASHI to reject claims 125-128.

B. There Is No Motivation to Combine ATARASHI and KONNO

Even if KONNO is properly cited, there is no motivation to combine ATARASHI and KONNO.

“The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggest the desirability of the combination.” MPEP 2143.01. “If proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification.” Id.

ATARASHI discloses a projection system for producing enlarged images for viewing on a projection screen. “In this way, a bright and clear color image is enlarged and formed on the screen.” ATARASHI, col. 9, lines 61-62 (emphasis added). In contrast, KONNO discloses an optical system for producing a reduced image to be printed on a wafer.

FIG. 1A illustrates the arrangement of optical members of a reduced-projection exposure system for printing on a wafer a reduced image of a circuit pattern drawn on a photomask or reticle. KONNO, col. 2, lines 44-47 (emphasis added).

Based on the foregoing, there is no motivation to combine ATARASHI and KONNO and claims 125-128 should be in condition for allowance.

C. KONNO Teaches Away from ATARASHI

Further, KONNO and ATARASHI teach away from their combination.

“It is improper to combine references where the references teach away from their combination.” MPEP 2145. ATARASHI discloses a projection system for producing enlarged images for viewing on a projection screen. In contrast, KONNO discloses an optical system for producing reduced images to be printed on a wafer. These references teach away from each other and their combination is therefore improper.

D. Neither ATARASHI, KONNO, nor a Combination of these References Discloses or Suggests Multiple Elements Recited in the Rejected Independent Claims

Even if the combination of ATARASHI and KONNO is proper, these references do not disclose or suggest multiple elements of the rejected independent claims.

1. Claim 125

Claim 125 recites a method of displaying an image comprising steps [a]-[d]. The Examiner relied on KONNO for allegedly disclosing step [a] and ATARASHI for allegedly disclosing steps [b]-[d]. The Examiner cited Figure 5 in ATARASHI for allegedly disclosing these steps.

Specifically, in claim 125, element [b][iv] recites “combining the altered separate primary color beams of light into a single collinear beam of light ...” and element [b][v] recites “resolving from the single collinear beam of light a first resolved beam of light ... and a second resolved beam of light....” As will be shown below, ATARASHI fails to disclose or suggest at least steps [b][iv] and [b][v] as recited in claim 125.

a. ATARASHI Does Not Disclose Step [b][iv]

In Figure 5 of ATARASHI, light transmitting through the liquid crystal cells 15BP, 15RP, and 15GP are combined into a first beam of light to be resolved by

polarized light beam splitter 17 and light transmitting through the liquid crystal cells 15BS, 15RS, and 15GS are combined into a second beam of light to be resolved by polarized light beam splitter 17.

A light [the first beam of combined light] penetrating through or reflected by the dichroic mirror 21 RP enters a polarized light beam splitter 17 for composing lights which is located at the middle of its light path, while a light [the second beam of combined light] penetrating through or reflected by the dichroic mirror 21RS is reflected by a plane mirror 18 located at the middle of its light path and then enters the polarized light beam splitter 17 from the direction perpendicular to the light path of the light coming from the dichroic mirror 21RP. ATARASHI, col. 8, lines 42-54 (emphasis added).

In contrast, step [b][iv] of claim 125 recites “combining the altered separate primary color beams of light into a single collinear beam of light ...” Based on the foregoing, ATARASHI does not disclose or suggest at least step [b][iv] of claim 125 and this claim should be in condition for allowance.

b. ATARASHI Does Not Disclose Step [b][v]

In ATARASHI, the two separate combined beams of light are resolved by the beam splitter 17 into four resolved beams. ATARASHI, col. 9, lines 43-56.

In contrast, step [b][v] of claim 125 recites “resolving from the single collinear beam of light a first resolved beam of light ... and a second resolved beam of light” Thus, ATARASHI also does not disclose or suggest step [b][iv] of claim 125 and this claim should be in condition for allowance.

2. Independent Claims 127

Independent claim 127 recites substantially the same limitations as claim 125 as discussed above in Section II.D. Based on the foregoing arguments with respect to claim 125, claim 127 should also be in condition for allowance.

3. Dependent Claims 126 & 128

Dependent claims 126 & 128 are dependent on independent claims 125 & 127, respectively. Based on the foregoing arguments with respect to the independent claims, these dependent claims should also be in condition for allowance.

E. Conclusion

Based on all of the foregoing, Applicant respectfully submits that the combination of ATARASHI and KONNO was improper, and even if the combination were proper, claims 125-128 are not unpatentable over these references.

III. Conclusion

In view of the foregoing, it is respectfully submitted that the application is now in condition for allowance. Should the Examiner believe that a telephone interview would help advance the prosecution of this case, the Examiner is requested to contact the undersigned attorney.

Respectfully submitted,

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